

# FCC MAIL ROOM

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
1998 Biennial Regulatory Review- )  
Amendment of Part 97 of the Commission's )  
Amateur Service Rules. )  
)  
)

WT Docket No. 98-143  
RM-9148  
RM-9150  
RM-9196

## COMMENTS OF

Woodie D. Thompson, WD4NSB, 111 Marvin Lane, Hamlet, N.C. 28345-7169. Phone (910)  
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I, Woodie Thompson, file these comments on November 20, 1998 in the FCC's Notice of Proposed  
Rule Making WT Docket 98-143.

I am a Tech-Plus class Amateur Radio Operator with 21 years operating time and a member of the  
ARRL. I was first licensed as a Novice in 1977 and became a Technician in 1978. My primary operations  
and modes are as follows: SSB on 28 MHz, 50 MHz, and 144 MHz. FM on 144 MHz.

I filed my original comments with the Commission on November 10, 1998 and am filing these  
supplemental comments to answer the questions that CQ Amateur Radio magazine says you want specific  
comments on. My original comments were in support of the ARRL's licensing restructure proposal, with  
exceptions and my supplemental comments will bear this out.

The ARRL proposal to combine the General, Tech-Plus, and Novice class licenses into one class C  
license is a very good proposal. Some, the Tech-Plus and Novice operators, would gain from this proposal,  
but the reduced number of classes and exams would justify the combination. Further if the CW  
requirement is reduced, per the ARRL's proposal, for the Extra class, then the Extra and Advanced  
classes should be combined, as there are minor differences in the privileges of the two classes. This would  
make for an even more streamlined system:

Class	Make up	Privileges
A	Present Extra and Advanced	Current Extra, plus reallocated Novice CW subbands for phone

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B	Present General, Tech-Plus and Novice	Current General, plus reallocated Novice CW subbands for phone
C	Present Technician	Current Technician

The CW requirement for Classes A and B should be set at 5 wpm. This would satisfy the International requirements, while removing one of the greatest hindrances to bringing new people into the Amateur Radio Service or to current Amateurs up grading to higher class licenses. This would also eliminate the need to issue waivers for handicapped operators, who wish to advance to higher class licenses. Further, as soon as it is internationally legal to do so all CW testing requirements should be abolished.

As to the ARRL's proposal to make the written exams more difficult to offset the lowering of the CW requirements, I think this is unnecessary. The exams are difficult enough at present from a technical standpoint. Most Amateurs do not build or repair their own equipment and the written exams should reflect this.

They should emphasize Rules, operating practices, and procedures. This should not take the place of radio theory testing, but should constitute at least 1/4 of the questions on an exam. If more emphasis was placed on rules, operating practices and procedures, then maybe people could tune in on the bottom of the 75 meter phone band or on 20 meter phone without being embarrassed by what they hear. I, further, believe that the written exams should continue with their current number of questions and the same passing requirements, even if the classes are combined along with their question pools, as listed above. The examinee would have many more possible questions to study for, but an operator or prospective operator would not face an exam that would take several hours to complete.

Most people are entering the Amateur Service as technicians, so the Novice license is no longer the entry mode of choice. This being the case, the Novice license should be phased out. No new Novice licenses should be issued. If a plan similar to the ARRL's or the one stated above is adopted, there will be no Novices and the question will be moot. If not, current Novices should keep their privileges and class until their licenses expire, but should not be renewed as continued renewal would not streamline the licensing structure or reduce the number of data bases or paperwork required for record keeping.

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If the commission decides to consolidate the Novice, Tech-Plus, and General classes into a single class, then the Novice sub bands should be reallocated to all Amateur classes, with HF privileges, as additional phone frequencies. If, on the other hand, the commission decides to keep the Novice class or indefinitely renew Novice licenses, then Novices should be allowed full access to the 80, 40, 15, and 10 meter bands with both CW and Phone privileges, but with the continued 200 watt output restriction. As stated above the current Novice subbands should be reallocated to all Amateurs with HF privileges as additional phone frequencies.

Should the commission consolidate the Novice, Tech-Plus, and General classes into one class there would be no need to continue the Tech-Plus class, however, if the decision is not to consolidate into one class, the Tech-Plus class should be continued. This is to avoid confusion, as the current licensing structure or the proposed licensing structures and international agreements differentiate between those having HF privileges (frequencies below 30 MHz) and those having VHF privileges (frequencies above 30 MHz), requiring manual CW testing for operating below 30 MHz. The Tech-Plus license should be retained to avoid possible illegal operations, confusion as to privileges, erroneous enforcement actions, and civil actions against the commission. In short, it is necessary to differentiate between Tech-Plus and Technician.

Current Advanced class operators should be allowed to be Volunteer Examiners for any class below their own. This would make more VEs available to administer exams, making testing more available with less travel time and more often. However, if the plan outlined above is adopted, this would be a moot point, since the Extra and Advanced classes would be merged.

RACES station Licenses should be phased out. At present there are only about 250 RACES licenses issued and ARES or any licensed Amateur can provide the same service. Eliminating this license would eliminate another database and reduce record keeping, working toward streamlining the Amateur service.

**"How can the Amateur Auxiliary improve enforcement of the Amateur Service rules?"** is the question stated in CQ Amateur Radio Magazine. This is without a doubt the toughest question to arise

from the commission's NPRM and one to which I do not have an answer. I only know that something has to be done to improve enforcement on the bands and our image as Amateur operators. The only suggestion that I have is as stated above, more emphasisses should be placed on rules, operating practices, and procedures in the written exams.

In summation, The Amateur Radio regulations, Part 97, are long over due for an overhaul. I hope the commission will give serious consideration to the ARRL's restructuring proposal or even better to the proposal out lined below:

### **American Radio Relay League's Proposal**

#### **Requirements for Amateur Licenses**

<b><u>License Class</u></b>	<b><u>Written Exam</u></b>	<b><u>Morse Exam</u></b>	<b><u>Level of difficulty</u></b>
Class D	Operational and technical questions relavant to VHF/UHF	None	Same as present Technician
Upgrade from D to C	Operational and technical questions relavant to HF	5 words per minutes	Same as upgrading from present Tech Plus to General
Upgrade from C to B	Similar to present Element 4A (Advanced)	12 words per minute	Same as upgrading to present Advanced, plus Morse Exam
Upgrade from B to A	More advanced technical questions	None	Same as upgrading from Advanced to Extra

#### **Privileges:**

<b><u>License Class</u></b>	<b><u>Privileges</u></b>
D	Same as present Technician (VHF/UHF)
C	Same as present General, with Novice sub bands reallocated for voice
B	Same as present Advanced, with Novice sub bands reallocated for voice
A	Same as present Extra, with Novice sub bands reallocated for voice

#### **License class composition:**

D	Present Technician
C	Present Novice, Tech Plus, and General
B	Present Advanced
A	Present Extra

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**Alternate Restructuring Proposal**

**Requirements for Amateur Licenses**

<u>License Class</u>	<u>Written Exam</u>	<u>Morse Exam</u>	<u>Level of difficulty</u>
C	Same as present Technician (VHF/UHF) with 1/4 of questions on rules, operating practices, and procedures	None	Same as present Technician
Upgrade from C to B	Same as present General with 1/4 of questions on rules, operating practices, and procedures	5 words per minute	Same as present General
Upgrade from B to A	Same as present Advanced and Extra with 1/4 of questions on rules, operating practices, and procedures	None	Same as combination of present Advanced and Extra

**Privileges:**

<u>License Class</u>	<u>Privileges</u>
C	Same as present Technician (VHF/UHF)
B	Same as present General with Novice sub bands reallocated for voice
A	Same as present Extra with Novice sub bands reallocated for voice

**License Class Composition:**

C	Present Technician
B	Present Novice, Tech Plus, and General
A	Present Advanced and Extra

Thank you for your time and consideration.

Submitted by:

*Woodie Thompson*

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